

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Dutchmen Manufacturing, Inc.
17705 County Road 38
Goshen, Indiana 46526**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-11273-00376	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Certification Form

Dutchmen Manufacturing, Inc.
Goshen, Indiana
Reviewer: Aida De Guzman

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Emergency/Deviation Form
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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a travel trailer production plant.

Authorized individual: Richard W. Florea
Source Address: 17705 County Road 38, Goshen, Indiana 46526
Mailing Address: 305 Steury Avenue, Goshen, Indiana 46526
Phone Number: (219) 534-1224
SIC Code: 3400 & 3792
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the relocation of the following plants' production lines to the existing registered Dutchmen Manufacturing, Inc., 17705 County Road 38, Goshen, Indiana plant:

(a) Dutchmen Manufacturing - 305 & 313 Steury Avenue, Goshen, Indiana:

313 Steury Avenue - GL Travel Trailer Production Line

GL Assembly Line includes chassis and floor preparation; wall lamination; cabinet and milling operations; slide-out assembly and installations. This line is capable of producing 1.75 units per hour, and it also includes the following equipment and processes:

- (1) One (1) cabinet and assembly area, equipped with two (2) table saws, two (2) mitre saws, two (2) saws, one (1) drill press, one (1) band saw, one (1) sander, two (2) routers, one (1) radial arm saw, and one (1) chopsaw.
- (2) One (1) unit assembly area, equipped with four (4) mitre saws, three (3) band saws, two (2) saws, one (1) router, one (1) radial arm saw, three (3) chop saws, three (3) drill presses, one (1) radial arm saw, two (2) grinders and one (1) caulk gun. PM emissions from this operation is controlled by dust collector, P1.
- (3) One (1) baghouse dust collector, identified as P2, which is a standby PM control unit.

305 Steury Avenue - GL and Middlebury Lite Final Finish Lines

GL Line has a capacity of 1.75 travel trailers per hour and Middlebury Lite Line has a capacity of 2.25 travel trailers per hour. These final finish lines, include the following equipment and processes, which are use by both lines:

- (1) Final assembly and final finish area, which is equipped with one (1) table saw, seven (7) mitre saws, one (1) saw, two (2) drill presses, five (5) bradly guns, three (3) double mitres, one (1) double drill, and three (3) chopsaws.
- (b) Thor Indiana, Inc. - State Road 15 North and Stoutco Drive, Bristol, Indiana:

Signature Travel Trailer Production Line

Signature Travel Trailer Production Line, includes chassis and floors preparation; lamination, which is capable of producing 0.75 travel trailer per hour. This line also include the following:

- (1) Cabinet and woodworking operations; and slide-out assembly and installations and final finish operation. The PM emissions from the woodworking operation is controlled by dust collector, P1.
- (c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana
 - (1) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
 - (2) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:
 - (a) Nine (9) chop saw
 - (b) Two (2) table saws
 - (c) One (1) belt sander
 - (d) One (1) router
 - (e) One (1) band saw
 - (f) One (1) drill press
 - (g) Two (2) radial arm saws
 - (h) One (1) grinder
 - (i) One (1) plasma cutter
 - (j) One (1) baghouse
 - (k) One (1) cyclone

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) 313 Steury Avenue - GL Travel Trailer Production Line consists of the following:
 - (1) One (1) metal inert gas welding station with a capacity of 0.01 pound per hour wire (lb/hr), two (2) stick welding stations with a capacity of 0.12 lb/hr electrode, and one (1) oxyacetylene cutting station with a capacity of 0.167 inch per minute (in/min), equipped with two (2) arc welders, one (1) MIG welder, two (2) torches, and one (1) plasma cut.

- (b) Thor Indiana, Inc. State Road 15 North and Stoutco Drive, Bristol
 - (1) Three (3) welding stations
- (c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana
 - (1) One (1) hot-melt gluing operation, which includes a heating device, application device and an atmospheric humidifying system emitting only water vapor. Cleanup operation is accomplished by using absorbent and no solvents.
 - (2) One (1) natural gas-fired radiant heater, identified as HW1, with a heat input capacity of 0.150 million Btu per hour (mmBtu/hr). Stack height is 15 feet with a diameter of 0.25 foot.
 - (3) Two (2) natural gas-fired space heaters, identified as H6 and H7, each having a heat input capacity of 0.250 mmBtu/hr. Stack height is 21 feet with a diameter of 1.0 foot.
 - (4) One (1) metal inert gas, type wire used is silicon carbide, with a maximum consumption per station of 0.01 pound wire per hour.
 - (5) Two (2) stick welding stations, type of electrode used 7014, with a maximum consumption of 2 electrode per hour, with electrode weight of 0.06 pound per stick.
 - (6) One (1) oxyacetylene, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.
 - (7) Unleaded gasoline aboveground storage tank, with a capacity of 250 gallons;
 - (8) Diesel fuel aboveground storage tank, with a capacity of 250 gallons;
 - (9) Hydraulic oil storage tank, with a capacity of 250 gallons located inside the building;
 - (10) 330 gallons of roof glue, stored in tote inside the building; and
 - (11) Paved and unpaved roads used for storing chassis frame and units.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the

U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of

receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.15 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Section D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: The relocation of the following plants' production lines to the existing registered Dutchmen Manufacturing, Inc., 17705 County Road 38, Goshen, Indiana plant:

- (a) Dutchmen Manufacturing - 305 & 313 Steury Avenue, Goshen, Indiana:

313 Steury Avenue - GL Travel Trailer Production Line

GL Assembly Line includes chassis and floor preparation; wall lamination; cabinet and milling operations; slide-out assembly and installations. This line is capable of producing 1.75 units per hour, and it also includes the following equipment and processes:

- (1) One (1) cabinet and assembly area, equipped with two (2) table saws, two (2) mitre saws, two (2) saws, one (1) drill press, one (1) band saw, one (1) sander, two (2) routers, one (1) radial arm saw, and one (1) chopsaw.
- (2) One (1) unit assembly area, equipped with four (4) mitre saws, three (3) band saws, two (2) saws, one (1) router, one (1) radial arm saw, three (3) chop saws, three (3) drill presses, one (1) radial arm saw, two (2) grinders and one (1) caulk gun. PM emissions from this operation is controlled by dust collector, P1.
- (3) One (1) baghouse dust collector, identified as P2, which is a standby PM control unit.

305 Steury Avenue - GL and Middlebury Lite Final Finish Lines

GL Line has a capacity of 1.75 travel trailers per hour and Middlebury Lite Line has a capacity of 2.25 travel trailers per hour. These final finish lines, include the following equipment and processes, which are use by both lines:

- (1) Final assembly and final finish area, which is equipped with one (1) table saw, seven (7) mitre saws, one (1) saw, two (2) drill presses, five (5) bradly guns, three (3) double mitres, one (1) double drill, and three (3) chopsaws.

- (b) Thor Indiana, Inc. - State Road 15 North and Stoutco Drive, Bristol, Indiana:

Signature Travel Trailer Production Line

Signature Travel Trailer Production Line, includes chassis and floors preparation; lamination, which is capable of producing 0.75 travel trailer per hour. This line also include the following:

- (1) Cabinet and woodworking operations; and slide-out assembly and installations and final finish operation. The PM emissions from the woodworking operation is controlled by dust collector, P1.

- (c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana
- (1) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
- (2) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:
- (a) Nine (9) chop saw
 - (b) Two (2) table saws
 - (c) One (1) belt sander
 - (d) One (1) router
 - (e) One (1) band saw
 - (f) One (1) drill press
 - (g) Two (2) radial arm saws
 - (h) (1) grinder
 - (i) (1) plasma cutter
 - (j) (1) baghouse
 - (k) (1) cyclone

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

CONSTRUCTION CONDITIONS

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The volatile organic input usage in the GL travel trailer production line when coating plastic, fiberglass, and vinyl parts of the trailer shall be limited to less than 25 tons per twelve-month period, rolled on a monthly basis.

During the first twelve (12) months of operation, volatile organic input usage in the GL travel trailer production line when coating plastic, fiberglass, and vinyl parts of the trailer divided by accumulated months of operation shall be limited to less than VOC emissions of 2.08 tons per month. Therefore, 326 IAC 8-1-6 will not apply.

- (b) Any change or modification that may increase the potential VOC emissions to 25 tons per year or more from the Signature or Middlebury Lite travel trailer production lines' when coating plastic, fiberglass, and vinyl parts of the trailer shall require prior approval before such change may occur.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The volatile organic input usage in the GL travel trailer production line when coating metal part of the trailer shall be limited to less than 15 pounds per day. Compliance with this condition will make 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

- (b) Any change or modification that may increase the actual VOC emissions to 15 pounds per day or more from the Signature or Middlebury Lite travel trailer production lines when coating metal part of the trailer shall require prior approval before such change may occur.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at the GL Travel Trailer Production Line, Signature Travel Trailer Production Line, and at the Middlebury Lite Travel Production Line shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.7 Hazardous Air Pollutants (HAPs)

- (a) The single HAP input usage from the entire source shall be limited to less than ten (10) tons per twelve-month period, rolled on a monthly basis.

During the first twelve (12) months of operation, single HAP input usage divided by accumulated months of operation shall be less than single HAP emissions of 0.83 tons per month.

- (b) The combined HAPs input usage from the entire source shall be limited to less than twenty-five (25) tons per twelve-month period, rolled on a monthly basis.

During the first twelve (12) months of operation, combined HAPs input usage divided by accumulated months of operation shall be less than combined HAP emissions of 2.08 tons per month.

Compliance with (a) and (b) of this condition will make 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.8 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the following processes shall be limited as follows:

- (a) The PM overspray emissions from the painting area shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The PM emissions from the GL Line and Signature Line's woodworking operation shall not exceed 9.67 pounds per hour.
- (c) The PM emissions from the Middlebury Lite Line's woodworking operation shall not exceed 0.37 pounds per hour.
- (d) The PM emissions from the County Road 38 plant existing woodworking operation shall not exceed 3.3 pounds per hour.

D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for all the trailer production lines woodworking operations and their dust collectors, and all the trailer production lines surface coating operations.

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and HAPs emissions limits specified in Conditions D.1.4, D.1.5 and D.1.7 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.4, D.1.5 and D.1.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Particulate Matter (PM)

The dust collectors, P1 and P2 shall be in operation at all times when the GL and Signature

lines', and the Middlebury Lite woodworking equipment are in operation.

D.1.13 Visible Emissions Notations

- (a) Daily visible emission notations of the dust collector, P1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.14 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.15 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.4, D.1.5 and D.1.7, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.4, D.1.5 and D.1.7.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each day from GL travel trailer production line when coating metal and monthly from GL, Signature and Middlebury Lite travel trailer when coating plastic, fiberglass, and vinyl parts of the trailer;
 - (3) The total VOC usage for each day from GL travel trailer production line when coating metal and monthly from GL, Signature and Middlebury Lite travel trailer when coating plastic, fiberglass, and vinyl parts of the trailer;

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (d) To document compliance with Condition D.1.13 the Permittee shall maintain records of daily visible emission notations of the GL and Signature Lines woodworking control stack exhaust.
- (e) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.14 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4, D.1.5 and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) 313 Steury Avenue - GL Travel Trailer Production Line consists of the following:
- (1) One (1) metal inert gas welding station with a capacity of 0.01 pound per hour wire (lb/hr), two (2) stick welding stations with a capacity of 0.12 lb/hr electrode, and one (1) oxyacetylene cutting station with a capacity of 0.167 inch per minute (in/min), equipped with two (2) arc welders, one (1) MIG welder, two (2) torches, and one (1) plasma cut.
- 305 Steury Avenue - GL and Middlebury Lite Final Finish Lines
- GL Line has a capacity of 1.75 travel trailers per hour and Middlebury Lite Line has a capacity of 2.25 travel trailers per hour. These final finish lines, include the following equipment and processes, which are use by both lines:
- (a) Final assembly and final finish area, which is equipped with one (1) table saw, seven (7) mitre saws, one (1) saw, two (2) drill presses, five (5) bradly guns, three (3) double mitres, one (1) double drill, and three (3) chopsaws.
- (b) Thor Indiana, Inc. State Road 15 North and Stoutco Drive, Bristol
- (1) Three (3) welding stations
- (c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana
- (4) One (1) metal inert gas, type wire used is silicon carbide, with a maximum consumption per station of 0.01 pound wire per hour.
 - (5) Two (2) stick welding stations, type of electrode used 7014, with a maximum consumption of 2 electrode per hour, with electrode weight of 0.06 pound per stick.
 - (6) One (1) oxyacetylene, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2 (Process Operations), the following processes shall be limited as follows:

Welding/Electrode Type	No. of Stations	Throughput	PM Emissions Limit (Pounds/hour)
MIG/Steel	2	0.708 lb/hr	0.020
MIG/Aluminum	2	0.20 lb/hr	0.0085
MIG/Silicone Carbide	2	0.020 lb/hr	0.0018
Stick	2	0.24 lb/hr	0.0097
Oxyacetylene	1	32.9 K in/yr	0.07

The limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376
Facility: GL travel trailer production line paint booth
Parameter: Volatile Organic Compounds (VOC)
Limit: GL travel trailer production line when coating plastic, fiberglass, and vinyl parts of the trailer, shall be limited to less than 25 tons/year rolled on a monthly basis.

During the first twelve (12) months of operation, volatile organic input usage in the GL travel trailer production line when coating plastic, fiberglass, and vinyl parts of the trailer divided by accumulated months of operation shall be less than VOC emissions of 2.08 tons per month, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376
Facility: Sourcewide
Parameter: Single HAP and Combined HAPs
Limit: Single HAP - Less than 10 tons per year, rolled on a monthly basis.

During the first twelve (12) months of operation, single HAP input usage divided by accumulated months of operation shall be less than single HAP emissions of 0.83 tons per month.

Combined HAPs - Less than 25 tons per year, rolled on a monthly basis.

During the first twelve (12) months of operation, combined HAPs input usage divided by accumulated months of operation shall be less than combined HAP emissions of 2.08 tons per month.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Single HAP This Month	Combined HAPs This Month	Single HAP Previous 11 Months	Combined HAPs Previous 11 Months	Single HAP 12 Month Total	Combined HAPs 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376
Facility: GL Travel Trailer Production Line
Parameter: VOC
Limit: The volatile organic input usage in the GL travel trailer production line when coating metal part of the trailer shall be limited to less than **15 pounds per day**.

Year: _____

Day	Month 1	Month 2	Month 3	Day	Month 1	Month 2	Month 3
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**4040 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dutchmen manufacturing, Inc.
Source Address: 17705 County Road 38, Goshen, Indiana
Mailing Address: 305 Steury Avenue, Goshen, Indiana
NSR/FESOP No.: NSR/F 039-11272-00376

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.4, D.1.5, & D.1.7)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a New Source Review and Federally State Operating Permit (FESOP)

Source Background and Description

Source Name:	Dutchmen Manufacturing, Inc.
Source Location:	17705 County Road 38, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3792
NSR/FESOP Permit No.:	039-11273-00376
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Dutchmen Manufacturing, Inc. relating to the relocation of the following plants' production lines to the existing registered Dutchmen Manufacturing, Inc., 17705 County Road 38, Goshen, Indiana plant:

- (a) Dutchmen Manufacturing - 305 & 313 Steury Avenue, Goshen, Indiana:

313 Steury Avenue - GL Travel Trailer Production Line

GL Assembly Line includes chassis and floor preparation; wall lamination; cabinet and milling operations; slide-out assembly and installations. This line is capable of producing 1.75 units per hour, and it also includes the following equipment and processes:

- (1) One (1) cabinet and assembly area, equipped with two (2) table saws, two (2) mitre saws, two (2) saws, one (1) drill press, one (1) band saw, one (1) sander, two (2) routers, one (1) radial arm saw, and one (1) chopsaw.
- (2) One (1) unit assembly area, equipped with four (4) mitre saws, three (3) band saws, two (2) saws, one (1) router, one (1) radial arm saw, three (3) chop saws, three (3) drill presses, one (1) radial arm saw, two (2) grinders and one (1) caulk gun. PM emissions from this operation is controlled by dust collector, P1.
- (3) One (1) baghouse dust collector, identified as P2, which is a standby PM control unit.

305 Steury Avenue - GL and Middlebury Lite Final Finish Lines

GL Line has a capacity of 1.75 travel trailers per hour and Middlebury Lite Line has a capacity of 2.25 travel trailers per hour. These final finish lines, include the following equipment and processes, which are use by both lines:

- (1) Final assembly and final finish area, which is equipped with one (1) table saw, seven (7) mitre saws, one (1) saw, two (2) drill presses, five (5) bradly guns, three (3) double mitres, one (1) double drill, and three (3) chopsaws.

- (b) Thor Indiana, Inc. - State Road 15 North and Stoutco Drive, Bristol, Indiana:

Signature Travel Trailer Production Line

Signature Travel Trailer Production Line, includes chassis and floors preparation; lamination, which is capable of producing 0.75 travel trailer per hour. This line also include the following:

- (1) Cabinet and woodworking operations; and slide-out assembly and installations and final finish operation. The PM emissions from the woodworking operation is controlled by dust collector, P1.

All the above equipment and processes were permitted at their respective original plant location. However, they were re-located, installed and operated at the new plant location at Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana, without any proper approval from the Office of Air Management (OAM).

- (c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana

Registered Construction and Operation Status - CP039-5558-00376

- (1) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
- (2) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:
 - (a) Nine (9) chop saw
 - (b) Two (2) table saws
 - (c) One (1) belt sander
 - (d) One (1) router
 - (e) One (1) band saw
 - (f) One (1) drill press
 - (g) Two (2) radial arm saws
 - (h) One (1) grinder
 - (i) One (1) plasma cutter
 - (j) One (1) baghouse
 - (k) One (1) cyclone

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

313 Steury Avenue - GL Travel Trailer Production Line consists of the following:

- (a) One (1) metal inert gas welding station with a capacity of 0.01 pound per hour wire (lb/hr), two (2) stick welding stations with a capacity of 0.12 lb/hr electrode, and one (1) oxyacetylene cutting station with a capacity of 0.167 inch per minute (in/min), equipped with two (2) arc welders, one (1) MIG welder, two (2) torches, and one (1) plasma cut.
- (b) Thor Indiana, Inc. State Road 15 North and Stoutco Drive, Bristol
 - (1) Three (3) welding stations

(c) Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana

- (1) One (1) hot-melt gluing operation, which includes a heating device, application device and an atmospheric humidifying system emitting only water vapor. Cleanup operation is accomplished by using absorbent and no solvents.
- (2) One (1) natural gas-fired radiant heater, identified as HW1, with a heat input capacity of 0.150 million Btu per hour (mmBtu/hr). Stack height is 15 feet with a diameter of 0.25 foot.
- (3) Two (2) natural gas-fired space heaters, identified as H6 and H7, each having a heat input capacity of 0.250 mmBtu/hr. Stack height is 21 feet with a diameter of 1.0 foot.
- (4) One (1) metal inert gas, type wire used is silicon carbide, with a maximum consumption per station of 0.01 pound wire per hour.
- (5) Two (2) stick welding stations, type of electrode used 7014, with a maximum consumption of 2 electrode per hour, with electrode weight of 0.06 pound per stick.
- (6) One (1) oxyacetylene, maximum metal thickness cut is 0.375, and maximum metal cutting rate of 0.167 inch per minute.
- (7) Unleaded gasoline aboveground storage tank, with a capacity of 250 gallons;
- (8) Diesel fuel aboveground storage tank, with a capacity of 250 gallons;
- (9) Hydraulic oil storage tank, with a capacity of 250 gallons located inside the building;
- (10) 330 gallons of roof glue, stored in tote inside the building; and
- (11) Paved and unpaved roads used for storing chassis frame and units.

Enforcement Issue

- (a) 305 & 313 Steury Avenue Dutchmen Manufacturing production lines, and Thor Indiana production line were permitted at their respective original plant location. However, they were re-located, installed and operated at the new plant location at Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana, without any proper approval from the Office of Air Management (OAM).

IDEM is aware that such re-location and operation had occurred prior to receipt of the proper permit.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 20, 1999, with additional information through an e-mail was received on September 22 and 28, 1999.

Emission Calculations

- (1) Natural Gas Combustion Emissions: See page 1 of 7 TSD App A for detailed calculations.
- (2) Emissions from the Surface Coating of Travel Trailers: See pages 2 through 7 TSD App A for detailed VOC, PM overspray and HAPs emissions.
- (3) Metal Fabrication Emissions:

Welding/Electrode Type	No. of Stations	Throughput	Emission Factor	Potential PM Emissions (ton/year)
MIG/Steel	2	0.708 lb/hr	5.2 lb/1000 lb	0.016
MIG/Aluminum	2	0.20 lb/hr	24 lb/1000 lb	0.02
MIG/Silicone Carbide	2	0.020 lb/hr	24 lb/1000 lb	0.002
Stick	2	0.24 lb/hr	19 lb/1000 lb	0.02
Oxyacetylene	1	32.9 K in/yr	0.1622 lb K in	0.003
TOTAL				0.061

Methodology:

PM Emissions = throughput, lb/hr * Ef, lb/1000 lb * 8760 hr/yr * ton/2000 lb
= throughput, K in/yr * Ef, lb/kin * ton/2000

- (4) Woodworking Emissions:

- (a) GL Line and Signature Line are controlled by dust collector P1.

$$\begin{aligned} \text{PM Emissions} &= 0.002858 \text{ gr/scf} * 6004.8 \text{ cf/min} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * \\ &\quad \text{lb/7000 gr} * \text{ton/2000 lb} \\ &= 0.64 \text{ ton/yr} \end{aligned}$$

- (b) Middlebury Lite woodworking operation is controlled by dust collector P2.

$$\begin{aligned} \text{PM Emissions} &= 0.0022 \text{ gr/scf} * 2725 \text{ cu ft/min} * 60 \text{ min/hr} * 8760 \text{ hr/yr} * \\ &\quad \text{lb/7000 gr} * \text{ton/2000 lb} \\ &= 0.225 \text{ ton/yr} \end{aligned}$$

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	3.68
PM-10	3.69
SO ₂	0.0
VOC	150.45
CO	0.7
NO _x	0.9

Note: The PM and PM10, and NOx emissions in this table includes the emissions from the insignificant activities

HAP's	Potential To Emit (tons/year)
Xylene	1.46
Toluene	21.27
Cumene	0.13
Ethyl Benzene	0.06
Hexane	3.05
Glycol Ethers	0.32
MEK	4.3
MDI	0.88
Methylene Chloride	1.9
TOTAL	33.37

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

And

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of one (1) single HAP greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/ facility	PM	PM-10	SO ₂	VOC	CO	NOx	Single HAP	Combined HAPs
Surface Coating	-	-	-	< 100	-	-	< 9	< 25
Total Emissions	-	-	-	< 100	-	-	< 9	< 25

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	no determination

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (based on the permits issued to Dutchmen Manufacturing, Inc. - 17705 County Road 38, Goshen, Indiana):

Permit No./Issued Date	Pollutant	Emissions (ton/yr)	Total Emissions (ton/yr)
Exemption CP039-8265-00376	No Emissions		
Registration CP039-5558-00376	PM=PM10	0.8	0.8
	SO ₂	0.003	0.003
	VOC	15.7	15.7
	CO	0.2	0.2
	NO _x	0.5	0.5

- (a) This existing source is an existing minor stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

The relocation of the two (2) Steury Drive Plants and the Stoutco Drive Plant made the source Potential to emit VOC, single HAP and combined HAPs greater than 100 tons/year, 10 tons/year and 25 tons /year respectively, and therefore, 326 IAC 2-7 (Part 70 Permit Program) is applicable.

Upon becoming subject to Part 70 Permit Program, the source has twelve (12) months to apply for a Title V or a FESOP, and in the interim should be issued a Minor Source Operating Permit (MSOP). The source however, chose to be reviewed under the FESOP right away, since there is no timing issue regarding new construction, because construction has already took place for the relocated plants.

Federal Rule Applicability

- (a) New Source Performance Standards:
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is required to submit a Preventive Maintenance Plan (PMP) for these facilities.
- (b) 326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than (ten (10) tons per year for Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).
- (c) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-2-12 (Surface Coating Emission Limitation-Wood Furniture and Cabinet Coating)

The GL Travel Trailer Production Line; Signature Travel Trailer Production Line; and the Middlebury Lite Travel Trailer Production Line when painting wood furnishings, which include cabinets (kitchen, bath and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and coated furnishings made of solid wood, wood composition or simulated wood material, are subject to 326 IAC 8-2-12 (Surface Coating Emission Limitation-Wood Furniture and Cabinet Coating), because each line actual VOC emissions are greater than 15 pounds per day (lb/day) before control (see Pages 2 through 4 of 6 TSD Appendix A for detailed calculations).

Pursuant to this rule, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application

Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source is in compliance, because all the methods used (brush, flowcoating, rollcoating, HVLP, and aerosol can coating which is equivalent to airless spray system) are among those listed in the rule.

(b) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

- (1) The GL Travel Trailer Production Line - is subject to this rule, because its actual VOC emissions of 16.73 pounds per day (coatings plus solvents emissions) exceeds 15 pounds per day (see Pages 2 through 4 of 6 TSD Appendix A for detailed calculations). Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

The coatings used at the GL Line for painting the metal part of the trailer have a volume weighted average of more than 5.0 pounds/gallon, exceeding the 3.5 pounds/gallon less water limit. The source had requested to limit the GL line's emissions to less than 15 pounds/day in order that 326 IAC 8-2-9 will not apply.

- (2) Signature Travel Trailer Production Line - is not subject to this rule, because its actual VOC emissions of 11.78 pounds per day (coatings plus solvents emissions) are less than 15 pounds/day (see Pages 2 through 4 of 6 TSD Appendix A for detailed calculations).
- (3) Middlebury Lite Travel Trailer Production Line- is not subject to this rule, because its actual VOC emissions of 5.3 pounds per day (coatings plus solvents emissions) are far less than 15 pounds/day (see Pages 2 through 4 of 6 TSD Appendix A for detailed calculations).

(c) 326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year or greater.

- (1) The GL Travel Trailer Production Line when painting plastic, vinyl and fiberglass has a potential VOC emissions of 30.85 tons per year. Therefore, 326 IAC 8-1-6 applies. The source however, requested a limit in the VOC input usage to less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply in this case.
- (2) The Signature Travel Trailer Production Line when painting plastic, vinyl and fiberglass has a potential VOC emissions of 19.25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (3) The Middlebury Lite Travel Trailer Production Line when painting plastic, vinyl and fiberglass has a potential VOC emissions of 0.78 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

(d) 326 IAC 6-3-2 (Process Operations)

- (1) The PM overspray emissions from the three (3) travel trailers production lines are subject to 326 IAC 6-3-2. This rule mandates a PM emissions using the following equations:

- (a) Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour} \\ P = \text{process weight rate in tons per hour}$$

The paint area for the three (3) travel trailer production lines has no stack vents. The source is in compliance with this rule, because most of the paint coating is applied by brush, rollcoater, flowcoater, wipe, and aerosol spray. Only the aerosol spray would have PM overspray.

- (2) The woodworking operations from the GL Line, Signature Line and the Middlebury Line are subject to 326 IAC 6-3-2. This rule mandates PM emissions limits as follows:

- (a) The GL Line and the Signature Line are controlled by dust collector P1, with 99.95% efficiency.

$$\begin{aligned} \text{GL Line process weight rate (PWR)} &= 5,423 \text{ lb/hr} \\ \text{Signature Line PWR} &= \frac{1,886 \text{ lb/hr}}{7,309 \text{ lb/hr}} \end{aligned}$$

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (3.6)^{0.67} \\ &= 9.67 \text{ lb/hr} \end{aligned}$$

These facilities are in compliance with 326 IAC 6-3-2, because their PM emission of 0.146 lb/hr is less than the PM limit of 9.67 lb/hr.

where: E = rate of emission in pounds per hour
P = process weight rate in tons per hour
= 3.6 ton/hr

- (b) Middlebury Line PWR = 56 lb/hr

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.028)^{0.67} \\ &= 0.37 \text{ lb/hr} \end{aligned}$$

- (3) The Metal Fabrication is subject to 326 IAC 6-3-2 (Process Weight Rate)

Welding/Electrode Type	No. of Stations	Throughput	Potential PM Emissions (ton/year)	(326 IAC 6-3-2) PM Emissions Limit (lb/hr) (ton/yr)	
MIG/Steel	2	0.708 lb/hr	0.016	0.020	0.087
MIG/Aluminum	2	0.20 lb/hr	0.02	0.0085	0.037
MIG/Silicone Carbide	2	0.020 lb/hr	0.002	0.0018	0.008
Stick	2	0.24 lb/hr	0.02	0.0097	0.04
Oxyacetylene	1	32.9 K in/yr 5 lb/hr	0.003	0.07	0.32
TOTAL				0.061	0.5

The above operations in the table are in compliance, since their PM emissions are less than the PM Limits.

- (e) 326 IAC 2-4.1-1 (New Source Toxics Control)
This rule applies to sources whose single hazardous air pollutant (HAP) is emitted at 10 tons per year or greater, or the combined HAPs is emitted at 25 tons per year or greater.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the dust collector, P1 stack exhaust for woodworking operation shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
2. The VOC emissions from the GL Travel Trailer Production line is limited to less than 15 pounds/day less water when coating metal, and to less than 25 tons per year when coating plastics, vinyl, or fiberglass. In order to demonstrate compliance with the limits the coatings usage from this line is recorded and VOC emissions reported.

3. The sourcewide VOC, single HAP, and combined HAPs emissions are limited to less than 100 tons/year, to less than 10 tons/year and to less than 25 tons/year respectively.

These monitoring conditions are necessary in order to comply with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments, since the source is limited to less than 9 tons/year for single HAP and less than 25 tons/yr for combined HAPs.

Conclusion

The relocation and operation of these travel trailer plants shall be subject to the conditions of the attached proposed **New Source Review (NSR) and Federally Enforceable State Operating Permit (FESOP) 039-11273-00376**.

**Indiana Department of Environmental Management
Office of Air Management**

**Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP)**

**Dutchmen Manufacturing, Inc.
17705 County Road 38
Goshen, Indiana 46526**

F-039-11273, Plt ID-039-00376

On November 2, 1999, the Office of Air Management (OAM) had a notice published in the Goshen News, Goshen, Indiana, stating that Dutchmen manufacturing, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a travel trailer production plant with dust collectors to control the PM emissions from the woodworking operations. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the Office of Air Management (OAM) has made the following changes to the draft FESOP:

- (1) Under the **Federal Rule Applicability**, the following explanation which has been overlooked is added to explain why 40 CFR Part 63.800, Subpart JJ is **not** applicable to the Dutchmen Manufacturing, Inc. cabinet and mill operations.

40 CFR Part 63.800, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations. This NESHAP applies to each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located in a plant site that is major source for HAPs. Pursuant to Part 63.800(b) of this NESHAP, a source that complies with the limit and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to the other provisions of this rule.

The combined HAP emissions of 2.2 tons per year from the source's cabinet and milling operations only account to 6.59 % of the plantwide combined HAP emissions of 33.37 tons per year (see spreadsheets for HAPs emissions).

The source is not subject to this NESHAP because the HAP emissions coming from the cabinet and milling operations are well below the criteria in paragraph (b)(3) which is the following:

Part 63.800(b)(3) - The source emits no more than 4.5 megagrams (Mg) or 5 tons of any one HAP per rolling 12-month period and no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, and at least 90% of the plantwide emissions per rolling 12-month period.

- (2) The following plant has been inadvertently omitted from the Facility Description Table of Section D.1. This will not result in any changes to the permit conditions. The Section D.1

Facility Description Table will read as follows (addition are bolded for emphasis):

Facility Description [326 IAC 2-8-4(10)]: The relocation of the following plants' production lines to the existing registered Dutchmen Manufacturing, Inc., 17705 County Road 38, Goshen, Indiana plant:

(a) Dutchmen Manufacturing - 305 & 313 Steury Avenue, Goshen, Indiana:

313 Steury Avenue - GL Travel Trailer Production Line

GL Assembly Line includes chassis and floor preparation; wall lamination; cabinet and milling operations; slide-out assembly and installations. This line is capable of producing 1.75 units per hour, and it also includes the following equipment and processes:

- (1) One (1) cabinet and assembly area, equipped with two (2) table saws, two (2) mitre saws, two (2) saws, one (1) drill press, one (1) band saw, one (1) sander, two (2) routers, one (1) radial arm saw, and one (1) chopsaw.
- (2) One (1) unit assembly area, equipped with four (4) mitre saws, three (3) band saws, two (2) saws, one (1) router, one (1) radial arm saw, three (3) chop saws, three (3) drill presses, one (1) radial arm saw, two (2) grinders and one (1) caulk gun. PM emissions from this operation is controlled by dust collector, P1.
- (3) One (1) baghouse dust collector, identified as P2, which is a standby PM control unit.

305 Steury Avenue - GL and Middlebury Lite Final Finish Lines

GL Line has a capacity of 1.75 travel trailers per hour and Middlebury Lite Line has a capacity of 2.25 travel trailers per hour. These final finish lines, include the following equipment and processes, which are use by both lines:

- (1) **Final assembly and final finish area, which is equipped with one (1) table saw, seven (7) mitre saws, one (1) saw, two (2) drill presses, five (5) bradly guns, three (3) double mitres, one (1) double drill, and three (3) chopsaws.**

(b) Thor Indiana, Inc. - State Road 15 North and Stoutco Drive, Bristol, Indiana:

Signature Travel Trailer Production Line

Signature Travel Trailer Production Line, includes chassis and floors preparation; lamination, which is capable of producing 0.75 travel trailer per hour. This line also include the following:

- (1) Cabinet and woodworking operations; and slide-out assembly and installations and final finish operation. The PM emissions from the woodworking operation is controlled by dust collector, P1.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 1 of 7 TSD App A

Company Name: Dutchmen Manufacturing, Inc.
Address: City 17705 Co. Rd. 38, Goshen, IN 46526
CP: 039-11273
Plt ID: 039-00376
Reviewer: Aida De Guzman
Date: Sept. 1, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.0

17.7

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.9	0.0	0.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
above
emission

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 2 of 7 TSD App A

Company Name: Dutchmen Manufacturing, Inc.
Address City: 17705 Co. Rd 38, Goshen, IN 46526
CP: 039-11273
Plt ID: 039-00376
Reviewer: Aida De Guzman
Date: August 30, 199

GL LINE																		
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Substrate	
Chassis and Floor Prep																		
Geocel 2300 sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.11040	1.750	2.77	2.77	0.54	12.85	2.35	0.00	4.54	100%	wood	
Spray N Go enamel	6.7	76.00%	0.0%	76.0%	0.0%	9.96%	0.02700	1.750	5.07	5.07	0.24	5.75	1.05	0.10	50.90	70%	metal	
Oatey PVC	7.5	88.00%	0.0%	88.0%	0.0%	12.00%	0.02200	0.750	6.60	6.60	0.11	2.61	0.48	0.00	55.00	100%	PVC	
												21.21	3.88	0.10				
Wall Lamination																		
Purfect Lok	8.9	0.00%	0.0%	0.0%	0.0%	100.00%	5.61000	1.750	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	wood	
Dynasolve Cleaner	8.8	100.00%	1.0%	1.0%	1.1%	0.00%	0.02700	1.500	0.09	0.09	0.00	0.09	0.02	0.00	ERR	100%	Machine Cleaner	
HM 738 hot melt	8.0	0.00%	0.0%	0.0%	0.0%	100.00%	0.01380	1.750	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	wood	
Enerbond SF-Ener 45	10.0	0.00%	0.0%	0.0%	0.0%	100.00%	0.01400	1.750	0.00	0.00	0.00	0.00	0.00	0.32	0.00	70%	wood	
Parts & Brakes Clean	6.3	96.00%	36.0%	60.0%	34.3%	0.00%	0.00540	1.750	5.75	3.78	0.04	0.86	0.16	0.00	ERR	70%	not coating	
												0.95	0.18	0.32				
Cabinet & Mill																		
Mobilbond	9.5	60.00%	0.0%	60.0%	0.0%	40.00%	0.31530	1.750	5.69	5.69	3.14	75.40	13.76	0.00	14.24	100%	wood	
Econotac adhesive	6.5	80.00%	0.0%	80.0%	0.0%	20.00%	0.02950	1.750	5.20	5.20	0.27	6.44	1.18	0.09	26.00	70%	wood	
Cyclo silicone	5.9	92.50%	7.5%	85.0%	5.3%	0.00%	0.00080	1.750	5.32	5.03	0.01	0.17	0.03	0.00	ERR	70%	wood	
Enerbond SF	10.0	0.00%	0.0%	0.0%	0.0%	100.00%	0.01400	1.750	0.00	0.00	0.00	0.00	0.00	0.32	0.00	70%	wood	
IPS Weld-on	7.3	73.50%	0.0%	73.5%	0.0%	30.00%	0.04400	1.750	5.33	5.33	0.41	9.85	1.80	0.00	17.76	100%	wood	
												91.86	16.77	0.41				
Slide-Out Assembly																		
Geocel sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.16670	1.750	2.77	2.77	0.81	19.41	3.54	0.00	4.54	100%	wood	
Cyclo silicone	5.9	92.50%	7.5%	85.0%	5.3%	0.00%	0.00020	1.750	5.32	5.03	0.00	0.04	0.01	0.00	ERR	70%	metal	
												19.45	3.55	0.00				
Unit Assembly																		
Self leveling sealant	11.3	31.00%	0.0%	31.0%	0.0%	61.00%	1.00000	1.750	3.50	3.50	6.13	147.13	26.85	0.00	5.74	100%	vinyl	
Geocel sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.08330	1.750	2.77	2.77	0.40	9.70	1.77	0.00	4.54	100%	wood	
901 BA adhesive	8.4	44.00%	0.0%	44.0%	0.0%	55.00%	1.50000	1.750	3.70	3.70	9.70	232.85	42.49	0.00	6.72	100%	wood	
Chroma base clear	7.2	35.00%	2.0%	33.0%	1.9%	2.70%	0.00500	1.750	2.41	2.37	0.02	0.50	0.09	0.04	87.63	75%	wood	
chroma one binder	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00500	1.750	7.10	7.10	0.06	1.49	0.27	0.00	ERR	75%	wood	
Oatey cleaner	6.6	95.00%	0.0%	95.0%	0.0%	0.00%	0.04400	1.750	6.27	6.27	0.48	11.59	2.11	0.00	ERR	100%	fiberglass	
Parts & Brake Clean	6.3	99.60%	36.0%	63.6%	34.3%	0.00%	0.00850	1.750	6.10	4.01	0.06	1.43	0.26	0.00	ERR	70%	equipment	
Dupont lacquer thinner	6.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00500	1.750	6.32	6.32	0.06	1.33	0.24	0.00	ERR	100%	not coating	
Mineral Spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00500	1.750	6.59	6.59	0.06	1.38	0.25	0.00	ERR	100%	not coating	
												407.81	74.33	0.04				
Final Finish																		
Geocel 2300 sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.05670	1.750	2.77	2.77	0.28	6.60	1.20	0.00	4.54	100%	wood	
Geocel 2000 sealant	8.3	33.50%	15.0%	18.5%	0.0%	66.50%	0.00790	1.750	1.54	1.54	0.02	0.51	0.09	0.00	2.32	100%	wood	
Bostik Supertak	5.6	90.00%	0.0%	90.0%	0.0%	10.00%	0.04550	1.750	5.04	5.04	0.40	9.63	1.76	0.06	50.40	70%	wood	
Tite R bond	7.4	98.20%	0.0%	98.2%	0.0%	1.50%	0.00100	1.750	7.29	7.29	0.01	0.31	0.06	0.00	485.76	100%	wood	
Touch N Tone enamel	5.6	65.00%	0.0%	65.0%	0.0%	13.11%	0.05050	1.750	3.63	3.63	0.32	7.71	1.41	0.23	27.72	70%	fiberglass	
Cyclo silicone	5.9	92.50%	7.5%	85.0%	5.3%	0.00%	0.00020	1.750	5.32	5.03	0.00	0.04	0.01	0.00	ERR	70%	metal	
1" AYD leather cleaner	8.3	93.00%	85.0%	8.0%	85.0%	0.00%	0.07050	1.750	4.43	0.66	0.08	1.97	0.36	0.00	ERR	100%	not coating	
Parts & Break clean	6.3	99.60%	36.0%	63.6%	34.3%	0.00%	0.00850	1.750	6.10	4.01	0.06	1.43	0.26	0.00	ERR	70%	not coating	
Glass cleaner	8.3	99.00%	91.0%	8.0%	0.0%	1.00%	0.02050	1.750	0.66	0.66	0.02	0.57	0.10	0.00	66.40	70%	not coating	
Lacquer Thinner	6.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01000	1.750	6.32	6.32	0.11	2.65	0.48	0.00	ERR	100%	not coating	
Mineral spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.02000	1.750	6.59	6.59	0.23	5.54	1.01	0.00	ERR	100%	not coating	
												87.45	6.74	0.29				

Total State Potential Emissions for GL Line. Add worst case coating to all solvents
Plant wide State Potential Emissions: GL Line Emissions + Signature Line Emissions + Lite Finish Emissions
METHODODOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Nai Dutchmen Manufacturing, Inc.
Address City 17705 Co. Rd. 38, Goshen, IN 46526
CP: 039-11273
Plt ID: 039-00376
Reviewer: Aida De Guzman
Date: August 30, 196

SIGNATURE LINE																	
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency	Substrate
Chassis and Floor Prep																	
Spray N Go	6.7	76.00%	15.0%	61.0%	0.0%	61.00%	0.02000	0.750	4.07	4.07	0.06	1.46	0.27	0.03	6.67	70%	metal
Oatey PVC Cement	5.7	88.00%	0.0%	88.0%	0.0%	12.00%	0.10000	0.750	5.02	5.02	0.38	9.03	1.65	0.00	41.80	100%	PVC
Russell 676 adhesive	9.0	82.80%	0.0%	82.8%	0.0%	12.00%	0.11790	0.750	7.45	7.45	0.66	15.81	2.89	0.18	62.10	70%	wood
												26.30	4.81	0.21			
Wall Lamination																	
MC urethane adhesive	9.0	0.00%	0.0%	0.0%	0.0%	100.00%	1.76000	0.750	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	wood
Cabinet & Mill																	
Mobilbond glue	9.5	60.00%	0.0%	60.0%	0.0%	40.00%	0.09000	0.750	5.69	5.69	0.38	9.22	1.68	0.00	14.24	100%	wood
Russell adhesive	5.7	82.80%	0.0%	82.8%	0.0%	12.00%	0.00590	0.750	4.72	4.72	0.02	0.50	0.09	0.01	39.33	70%	wood
Cyclo silicone	5.9	92.50%	7.5%	85.0%	5.3%	0.00%	0.00120	0.750	5.32	5.03	0.00	0.11	0.02	0.00	ERR	70%	metal
												9.83	1.79	0.01			
Slide-Out Assembly																	
Self leveling sealant	11.3	31.00%	0.0%	31.0%	0.0%	61.00%	0.02830	0.750	3.50	3.50	0.07	1.78	0.33	0.00	5.74	100%	wood
Geocel sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.08380	0.750	2.77	2.77	0.17	4.18	0.76	0.00	4.54	100%	wood
901 BA adhesive	8.4	44.00%	0.0%	44.0%	0.0%	55.00%	0.40000	0.750	3.70	3.70	1.11	26.61	4.86	0.00	6.72	100%	wood
Colorimetric sealant	8.2	27.50%	0.0%	27.5%	0.0%	72.00%	0.04020	0.750	2.26	2.26	0.07	1.63	0.30	0.00	3.14	100%	fiberglass-filon
Parabond adhesive	9.5	65.00%	54.3%	10.8%	0.0%	35.00%	0.10000	0.750	1.02	1.02	0.08	1.84	0.34	0.00	2.92	100%	fiberglass-filon
												35.73	6.59	0.00			
Unit Assembly																	
Self leveling sealant	11.3	31.00%	0.0%	31.0%	0.0%	61.00%	0.10760	0.750	3.50	3.50	0.28	6.78	1.24	0.00	5.74	100%	* wood
Geocel sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.04170	0.750	2.77	2.77	0.09	2.08	0.38	0.00	4.54	100%	wood
IPS Weld-on cement	7.3	73.50%	8.5%	65.0%	0.0%	30.00%	0.00000	0.005	0.75	4.71	0.00	0.00	0.00	0.00	15.71	100%	PVC
Mobilbond glue	9.5	60.00%	0.0%	60.0%	0.0%	40.00%	0.50000	0.750	5.69	5.69	2.14	51.25	9.35	0.00	14.24	100%	wood
901 BA adhesive	8.4	44.00%	0.0%	44.0%	0.0%	55.00%	0.40000	0.750	3.70	3.70	1.11	26.61	4.86	0.00	6.72	100%	vinyl
Oatey PVC Cement	7.5	88.00%	0.0%	88.0%	0.0%	12.00%	0.04000	0.750	6.60	6.60	0.20	4.75	0.87	0.00	55.00	100%	PVC
Russell adhesive	5.7	82.80%	0.0%	82.8%	0.0%	12.00%	0.03680	0.750	4.72	4.72	0.13	3.13	0.57	0.00	39.33	100%	wood
Colorimetric sealant	8.2	27.50%	0.0%	27.5%	0.0%	72.00%	0.04020	0.750	2.26	2.26	0.07	1.63	0.30	0.00	3.14	100%	fiberglass-filon
Oatey cleaner	6.6	100.00%	5.0%	95.0%	0.0%	3.00%	0.00200	0.000	6.27	6.27	0.00	0.00	0.00	0.00	209.00	100%	not coating
Mineral Spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.01000	0.750	6.59	6.59	0.05	1.19	0.22	0.00	ERR	100%	not coating
												97.42	17.79	0.00			
Final Finish																	
Geocel 2300 sealant	7.9	35.00%	0.0%	35.0%	0.0%	61.00%	0.16750	0.750	2.77	2.77	0.35	8.36	1.53	0.00	4.54	100%	fiberglass
Geocel 2000 sealant	8.3	33.50%	0.0%	33.5%	0.0%	66.50%	0.03960	0.750	2.79	2.79	0.08	1.99	0.36	0.00	4.20	100%	metal
Geocel stainmatch	13.3	20.00%	19.0%	1.0%	30.3%	80.00%	0.02470	0.750	0.19	0.13	0.00	0.06	0.01	0.00	0.17	100%	metal
Russell adhesive	5.7	82.80%	0.0%	82.8%	0.0%	12.00%	0.00000	0.000	4.72	4.72	0.00	0.00	0.00	0.00	39.33	70%	wood
Touch N Tone enamel	5.6	65.00%	8.8%	56.2%	0.0%	13.11%	0.80500	0.750	3.14	3.14	1.90	45.52	8.31	1.55	23.96	70%	fiberglass
Centari acrylic enamel	7.7	64.60%	0.0%	64.6%	0.0%	30.34%	0.02000	0.750	5.00	5.00	0.08	1.80	0.33	0.05	16.48	75%	fiberglass
Enamel reducer	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.02000	0.750	6.44	6.44	0.10	2.32	0.42	0.00	ERR	75%	fiberglass
Isocyanate activator	8.1	74.00%	9.0%	65.0%	8.7%	28.40%	0.02000	0.750	5.75	5.25	0.08	1.89	0.34	0.03	18.47	75%	fiberglass
Johnson shine-up lemon	7.3	24.00%	0.0%	24.0%	70.0%	0.00%	0.06160	0.750	5.84	1.75	0.08	1.94	0.35	0.34	ERR	70%	wood
Glass cleaner	8.3	99.90%	87.0%	12.9%	87.0%	0.00%	0.00200	0.750	8.28	1.08	0.00	0.04	0.01	0.00	ERR	70%	not coating
Crazy clean	8.3	94.00%	88.0%	6.0%	94.0%	0.00%	0.05420	0.750	8.30	0.50	0.02	0.49	0.09	0.03	ERR	70%	not coating
Finishmaster Lacquer thin	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.01000	0.750	6.80	6.80	0.05	1.22	0.22	0.00	ERR	100%	not coating
Mineral Spirits	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.01000	0.750	6.59	6.59	0.05	1.19	0.22	0.00	ERR	100%	not coating
190 GPC solvent	6.8	100.00%	6.6%	93.4%	0.0%	0.00%	0.04000	0.750	6.33	6.33	0.19	4.56	0.83	0.00	ERR	100%	not coating
												71.38	13.02	2.00			

Total State Potential Emissions from Signature Line

Add worst case coating to all solvents

10.04

240.99

43.98

2.22

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Total = Worst Coating + Sum of all solvents used

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 5 of 7 TSD App A

Compai Dutchmen Manufacturing, Inc.
Address: 17705 Co. Rd. 38, Goshen, IN 46526
CP#: 039-11273
Pit ID: 039-00376
Permit I Aida De Guzman
Date: August 30, 19

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Xylene	Weight % Toluene	Weight % Cumene	Weight % Ethyl Benze	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % MEK	Weight % MDI	Weight % Methylene chlorid	Xylene Emission s (ton/yr)	Toluene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emission s (ton/yr)	Hexane Emission s (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	MDI Emissions (ton/yr)	Methylene Chk ERR
GL LINE																							
Chassis and Floor Prep																							
Geocel 2300 sealant	7.9	0.11040	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spray N Go enamel	6.7	0.02700	1.750	5.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.07	0.28	0.00	0.00	0.00	0.00	0.00	0.14	0.00	0.00
Oatey PVC	7.5	0.02200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	55.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00
Wall Lamination																							
Purfect Lok	8.9	5.61000	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dynasolve Cleaner	8.8	0.02700	1.500	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.00	0.00
HM 738 hot melt	8.0	0.01380	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Enerbond SF-Ener 45	10.0	0.01400	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.50%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.00
Parts & Brakes Clean	6.3	0.00540	1.750	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cabinet & Mill																							
Mobilbond	9.5	0.31530	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Econotac adhesive	6.5	0.02950	1.750	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.51	0.00	0.00	0.00	0.00	0.00
Cyclo silicone	5.9	0.00080	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Enerbond SF	10.0	0.01400	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.50%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.00
IPS Weld-on	7.3	0.04400	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	65.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.60	0.00	0.00
Slide-Out Assembly																							
Geocel sealant	7.9	0.16670	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo silicone	5.9	0.00020	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit Assembly																							
Self leveling sealant	11.3	1.00000	1.750	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	17.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Geocel sealant	7.9	0.08330	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
901 BA adhesive	8.4	1.50000	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chroma base clear	7.2	0.00500	1.750	16.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.00%	0.00%	0.00%	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00
chroma one binder	7.1	0.00500	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00
Oatey cleaner	6.6	0.04400	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	2.10	0.00	0.00	0.00
Parts & Brake Clean	6.3	0.00850	1.750	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dupont lacquer thinnr	6.3	0.00500	1.750	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mineral Spirits	6.6	0.00500	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Final Finish																							
Geocel 2300 sealant	7.9	0.05670	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Geocel 2000 sealant	8.3	0.00790	1.750	7.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bostik Supertak	5.6	0.04550	1.750	0.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.78	0.00	0.00	0.00	0.00	0.00
Title R bond	7.4	0.00100	1.750	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Touch N Tone enamel	5.6	0.05050	1.750	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cyclo silicone	5.9	0.00020	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1" AYD leather cleane	8.3	0.07050	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parts & Break clean	6.3	0.00850	1.750	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glass cleaner	8.3	0.02050	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	6.3	0.01000	1.750	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mineral spirits	6.6	0.02000	1.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

GL Line Total Single HAP Emissions:														0.15	18.25	0.02	0.00	1.29	0.31	0.00	4.30	0.10	0.00
GL Line Total Combined HAPs Emissions:																					24.42		
Plantwide Total Single HAP Emissions:														1.46	21.27	0.13	0.06	3.05	0.32	0.00	4.30	0.88	1.90
Plantwide Total Combined HAPs:																					33.37		

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Page 6 of 7 TSD App A

Compai Dutchmen Manufacturing, Inc.
Address: 17705 Co. Rd. 38, Goshen, IN 46526
CP#: 039-11273
Pit ID: 039-00376
Permit I Aida De Guzman
Date: August 30, 19

[illegible]

0	0.22	0.01	0.0	0.5	0.01	0.0	0.0	0.0	0.0
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0.73